

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

DONNA CURLING, ET. AL)	
)	
)	CIVIL ACTION FILE NO.
)	1:17-CV-02989-AT
Plaintiff,)	
)	
v.)	
)	
BRAD RAFFENSPERGER, <i>et al.</i> ,)	
)	
)	
Defendants.)	
_____)	

**FULTON COUNTY DEFENDANTS' MOTION
FOR EXTENSION OF TIME**

COME NOW FULTON COUNTY DEFENDANTS, and respectfully move the Court to grant them the same extension that State Defendants seek in their Unopposed Motion for Extension of Time [Doc. 1185] to respond to Coalition Plaintiffs' Motion to Sever, Grant Motion for Attorney's Fees, Grant Motion for Sanctions, and Enter Final Judgment on Severed Claims on October 6, 2021. [Doc. 1182].

Coalition Plaintiffs filed a Motion to Sever, Grant Motion for Attorney's Fees, Grant Motion for Sanctions, and Enter Final Judgment on Severed Claims on October 6, 2021. Fulton County Defendants have until Wednesday, October 20, 2021 to file a response. As indicated by State Defendants in their motion, this

response date is in the middle of depositions of other plaintiffs in this case: Jeffrey Schoenberg, Donna Curling, and Donna Price.

Fulton County Defendants hereby request the same extension of time of 12 days, until November 1, 2021 that State Defendants have requested. As relayed by State Defendants' request, this extension to respond to Coalition Plaintiffs' Motion should not prejudice Plaintiffs or burden the Court in relation to this case. Counsel for State Defendants has conferred with Coalition Plaintiffs' counsel regarding this request, and they do not object to an extension of time for Defendants to file their response to the Motion no later than November 1, 2021.

For the aforementioned reasons, Fulton County Defendants respectfully request the court to grant them until November 1, 2021 to respond to Coalition Plaintiffs' Motion to Sever, Grant Motion for Attorney's Fees, Grant Motion for Sanctions, and Enter Final Judgment on Severed Claims.

This 18th day of October, 2021.

Respectfully Submitted,

OFFICE OF THE COUNTY ATTORNEY
Kaye Woodard Burwell
Georgia Bar No. 775060

/s/ David R. Lowman
David R. Lowman
Georgia Bar No. 460298
Cheryl Ringer
Georgia Bar No. 557420

OFFICE OF THE COUNTY ATTORNEY

141 Pryor Street, S.W., Suite 4038

Atlanta, Georgia 30303

(404) 612-0246

(404) 730-6324 (fax)

L.R. 7.1(D) CERTIFICATION

I certify that this Motion has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 14-pt Times New Roman font.

/s/ David R. Lowman
David R. Lowman